

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MIGUEL DOMINGUEZ	:	VIOLATIONS:
RICHARD BAEZ	:	18 U.S.C. § 1951(a) (conspiracy to
	:	interfere with interstate commerce by
	:	robbery - 1 count)
	:	18 U.S.C. § 1951(a) (interference with
	:	interstate commerce by robbery - 1 count)
	:	18 U.S.C. § 924(c) (using and carrying a
	:	firearm during a crime of violence - 1
	:	count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At times relevant to this indictment:

1. The Econolodge, located at 2115 Downyflake Lane in Allentown, Pennsylvania, was engaged in interstate commerce.

THE ROBBERY CONSPIRACY

2. On or about April 17, 2007, in Allentown, in the Eastern District of Pennsylvania, defendants

**MIGUEL DOMINGUEZ and
RICHARD BAEZ**

conspired and agreed, together and with others known and unknown to the grand jury, to commit

robbery, which robbery would unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, in that defendants DOMINGUEZ and BAEZ conspired to unlawfully take and obtain money from the Econolodge located at 2115 Downeyflake Lane, Allentown, Pennsylvania in the presence of an employee of the Econolodge and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person and property and property in her possession, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

3. It was part of this conspiracy that defendants MIGUEL DOMINGUEZ and RICHARD BAEZ:

- (a) Used a motor vehicle to travel to and provide an escape from the Econolodge;
- (b) Armed themselves with a short-barreled shotgun and shotgun shells;
- (c) Used gloves and clothing to conceal their identity; and
- (d) Confronted an employee of the Econolodge, brandished a short-barreled shotgun, and then threatened to injure and kill the employee to obtain money.

OVERT ACTS

In furtherance of this conspiracy, defendants MIGUEL DOMINGUEZ and RICHARD BAEZ committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

On or about April 17, 2007:

1. Defendant RICHARD BAEZ drove both himself and MIGUEL DOMINGUEZ to the Econolodge hotel located at 6115 Downeyflake Lane in Allentown, Pennsylvania.
2. While defendant RICHARD BAEZ waited outside in the driver's seat of the motor vehicle as a look-out, defendant MIGUEL DOMINGUEZ went into the Econolodge, brandished a sawed-off shotgun, demanded money from an employee, stole approximately \$233 from the cash drawer of the Econolodge, and fled.
3. After defendant MIGUEL DOMINGUEZ left the Econolodge, he got into the waiting car and defendant RICHARD BAEZ drove them away

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 and Overt Acts 1 through 3 of Count One of this indictment are incorporated here.
2. On or about April 17, 2007, in Allentown, in the Eastern District of Pennsylvania, defendants

MIGUEL DOMINGUEZ and RICHARD BAEZ

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendants DOMINGUEZ and BAEZ unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money, from the Econolodge located at 2115 Downeyflake Lane, Allentown, Pennsylvania, in the presence of an employee of the Econolodge and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future to her person and property in her possession, that is, by brandishing a short-barreled shotgun and demanding money.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 and Overt Acts One through Three of Count One of this indictment are incorporated here.

2. On or about April 17, 2007, in Allentown, in the Eastern District of Pennsylvania, defendants

**MIGUEL DOMINGUEZ and
RICHARD BAEZ**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, one Ithaca 20 gauge short-barreled (sawed-off) shotgun, serial number 371088521, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951(a).

In violation of Title 18, United States Code, Sections 924(c)(1)(A), (B)(i), 921(a)(8), and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this indictment, defendants

**MIGUEL DOMINGUEZ and
RICHARD BAEZ**

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of this offense, including, but not limited to, one Ithaca 20 gauge short-barreled (sawed-off) shotgun, serial number 371088521, and two yellow shotgun rounds.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney